

Jorge Alejandro Rojas
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Plaintiff in Pro Se

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

| | |
|--|---|
| Jorge Alejandro Rojas | CASE NUMBER 2:23-cv-02667-SPG-KS |
| <p style="text-align: center;">v. PLAINTIFF(S),</p> <p>Unplugged Media LLC, Alexander Bykhovsky aka Alex Gold, Chris Biz Services LLC (as separate Texas and Wyoming companies), Christopher Gutierrez Cuenza aka Chris Cuenza, Alex Gold Holdings LLC</p> <p style="text-align: center;">DEFENDANT(S)</p> | <p style="text-align: center;">APPLICATION TO THE CLERK TO TAX COSTS</p> |

Complete this form, including the Bill of Costs chart in section 2 and, if claiming witness fees, the Witness Fees chart in section 3. The completed form must then be submitted to the Court in two ways: (1) saved as a PDF document and e-filed (with all necessary attachments) in the case docket using the "Clerk to Tax Costs (CV-59)" event in the Court's CM/ECF System; and (2) saved as a Word document (.doc or .docx) and submitted by email (without attachments) to Cost_BillsLA@cacd.uscourts.gov. See L.R. 54-3 et seq. and the Bill of Costs Handbook (www.cacd.uscourts.gov/court-procedures/filing-procedures/bill-costs) for more information.

| | | | |
|--|---|-----------|-----|
| Name(s) of party or parties claiming costs: | Jorge Alejandro Rojas | | |
| Judgment entered on: | May 7, 2025 | Docket #: | 111 |
| Names of party(ies) against whom judgment was entered: | Unplugged Media LLC, Alexander Bykhovsky aka Alex Gold, Chris Biz Services LLC (as separate Texas and Wyoming companies), Christopher Gutierrez Cuenza aka Chris Cuenza, Alex Gold Holdings LLC | | |

DECLARATION UNDER 28 U.S.C. § 1924

I declare under penalty of perjury that the costs itemized in this CV-59 Form are correct and were necessarily incurred in this action and that the services for which fees have been charged were actually and necessarily performed.

Date: May 21, 2025

Signature:

/s/ Jorge Alejandro Rojas

Name:

Jorge Alejandro Rojas

☐ Attorney of

Pro Se Plaintiff

Record for:

COURT USE ONLY

☒ Application GRANTED in whole/part; costs are taxed in the amount of **\$1,942.00**.

☐ Application DENIED because: ☐ Not timely filed (L.R. 54-2.1).

☐ Insufficient supporting documentation provided (L.R. 54-2.1).

☐ Filer is not prevailing party (L.R. 54-1).

Date: October 6, 2025

Brian D. Karth, District Court Executive/Clerk of Court

By: Natalie L. Calkins
Deputy Clerk

BILL OF COSTS

*The Clerk does not have discretion to tax any item
not identified as taxable in the Local Rules.*

Click in one of the grey boxes in the "Amount Claimed" column, enter the relevant amount, and then use the "tab" key to move to the next field; this will cause the form to adjust the column total at the bottom of the chart.

A list of disallowance codes is provided below the chart.

| TAB | AMOUNT CLAIMED | SUPPORTING DOCUMENTS (Must be itemized below and cross-referenced to attachments.) | AMOUNT ALLOWED | ~ IF ANY AMOUNT DISALLOWED ~ | | |
|-----|--|---|----------------|--------------------------------------|-------|--------------------|
| | | | | AMOUNT | CODE* | ADDITIONAL REASONS |
| | | | | (Shaded columns for Court use only.) | | |
| 1 | L.R. 54-3.1 Clerk's Fees (only if in <u>28 USC § 1914</u> or <u>www.uscourts.gov/services-forms/fees/district-court-miscellaneous-fee-schedule</u>) | | | | | |
| | \$402.00 | Exhibit 1 – Pay.gov Confirmation of Payment of Filing Fee. <u>Dkt. 1</u> also states filing fee paid. | | | | |
| 2 | L.R. 54-3.2 Fees for Service of Process | | | | | |
| | \$1,540.00 | Exhibit 2 – p. 1 – August 30, 2023 ABC Legal Invoice for service of process on Unplugged Media (\$300). | | | | |
| | | Exhibit 2 – p. 2-3 – September 14, 2023 PayPal Invoice for service of process on Byhkovsky (\$365). Defendants were added in the Second Amended Complaint. | | | | |
| | | Exhibit 2 – p. 4 – September 6, 2024 ABC Legal Invoice for service of process on Alex Gold Holdings LLC, Chris Biz Services LLC (as a WY company), Chris Biz Services LLC (as a TX company), Christopher Gutierrez Cuenza (\$380.00 total for these attempts). | | | | |
| | | Exhibit 2 – p. 5 – October 3, 2024 ABC Legal Invoice for service of process on Alex Gold Holdings LLC, at an alternative address because defendant was evasive and additional attempts required (\$95.00). | | | | |
| | | Exhibit 2 – p. 6 – September 23, 2024 ABC Legal Invoice for service of process on Unplugged Media LLC (\$300), service of process was required because default had been entered against defendant and additional claims for relief were included in the second amended complaint. | | | | |
| | | Exhibit 2 – p. 7 – November 7, 2024 Proof of Service from | | | | |

| TAB | AMOUNT CLAIMED | SUPPORTING DOCUMENTS (Must be itemized below and cross-referenced to attachments.) | AMOUNT ALLOWED | #797 ~ IF ANY AMOUNT DISALLOWED ~ | | |
|-----|---|--|----------------|--------------------------------------|-------|--------------------|
| | | | | AMOUNT | CODE* | ADDITIONAL REASONS |
| | | | | (Shaded columns for Court use only.) | | |
| | | Nevada Secretary of State indicating \$100 check paid for Alex Gold Holdings LLC service of process via the Secretary of State, this was required following service attempts via a process server because unavailable defendant. All these charges were necessarily incurred in order to serve defendants with process in this case. All these charges were reasonable and were paid to commercial or government entities whose primary business is service of process or of a regulatory nature. Some Defendants had to be served twice, because they were part of the case and had a default entered and subsequent second amended complaint added claims for relief. | | | | |
| 3 | L.R. 54-3.3 United States Marshal's Fees | | | | | |
| | | | | | | |
| 4 | L.R. 54-3.4 Transcripts of Court Proceedings (order or stipulation required and must be attached) | | | | | |
| | | | | | | |
| 5 | L.R. 54-3.5 Depositions (if order or stipulation required by rule, it must be attached) | | | | | |
| | | | | | | |
| 6 | L.R. 54-3.6 Witness Fees (TAXED AT STATUTORY RATE ONLY; complete Witness Fees Chart, below) | | | | | |
| | | | | | | |
| 7 | L.R. 54-3.7 Interpreter's Fees (document translation costs are not taxable) | | | | | |
| | | | | | | |
| 8 | L.R. 54-3.8 Docket Fees (only as provided by 28 U.S.C. § 1823) | | | | | |
| | | | | | | |
| 9 | L.R. 54-3.9 Court-Appointed Experts, Masters, Commissioners, and Receivers (attach appointment order) | | | | | |
| | | | | | | |
| 10 | (a) | L.R. 54-3.10 Certification, Exemplification and Reproduction of Documents (if order or stip required, it must be attached) | | | | |
| | | L.R. 54-3.10(a): "cost of copies of documents necessarily filed and served" | | | | |
| | | | | | | |
| | (b) | L.R. 54-3.10(b): "cost of copies of documents or other materials admitted into evidence" | | | | |
| | | | | | | |
| | (c) | L.R. 54-3.10(c): "Fees for an official certification of proof respecting the non-existence of a document or record" | | | | |
| | | | | | | |
| (d) | L.R. 54-3.10(d): "Patent Office charges" for necessary "patent file wrappers and prior art patents" | | | | | |
| | | | | | | |
| (e) | L.R. 54-3.10(e): "Notary fees" of taxable documents | | | | | |

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| TAB | AMOUNT CLAIMED | SUPPORTING DOCUMENTS (Must be itemized below and cross-referenced to attachments.) | AMOUNT ALLOWED | ~ IF ANY AMOUNT DISALLOWED ~ | | |
|-------|----------------|--|----------------|------------------------------|-------|--------------------|
| | | | | AMOUNT | CODE* | ADDITIONAL REASONS |
| | | | | | | |
| | (f) | <i>L.R. 54-3.10(f): "Fees for certification or exemplification of any document or record necessarily obtained for use in the case"</i> | | | | |
| | (g) | <i>L.R. 54-3.10(g): "cost of physically replicating or reproducing material necessarily obtained for use in the case"</i> | | | | |
| 11 | | <i>L.R. 54-3.11 Premiums on Undertakings and Bonds</i> | | | | |
| 12 | | <i>L.R. 54-3.12 Other Costs (Court order must be attached; only visual aids, models, and photographs taxable under this rule)</i> | | | | |
| 13 | | <i>L.R. 54-3.13 State Court Costs (taxable only if taxable in state court; include citation to applicable state statute or rule)</i> | | | | |
| 14 | | <i>L.R. 54-4 Items Taxable as Costs on Appeal (only items taxable under <u>Fed. R. App. P. 39(e)</u>)</i> | | | | |
| 15 | | <i>L.R. 54-5 Items Taxable as Costs on a Bankruptcy Appeal to the District Court</i> | | | | |
| TOTAL | \$1,942.00 | | \$1,942.00 | \$0.00 | | |

***Reason Codes for Disallowance of Claimed Costs:**

"A" – No supporting documents provided.

"B" – Order/Stip required but not provided.

"C" – Documents provided do not support full amount claimed.

"D" – Item does not fall within the scope of the Local Rule.

"E" – Invoice includes both taxable and non-taxable costs, but no breakdown is provided.

"F" – Amount claimed reduced by agreement after meet and confer.

"G" – Other.

WITNESS FEES**WITNESS FEES/EXPENSES COMPUTATION WORKSHEET: INSTRUCTIONS**

- Attendance fees taxable only at statutory rate. 28 U.S.C. § 1821(b).
- Travel in a privately owned vehicle ("POV") is computed at federal government rates in the year of travel. Visit [gsa.gov](https://www.gsa.gov) for current POV mileage reimbursement rate.
- For mileage claims, distances should be documented (through Google maps or similar); point of trip origin should be documented if different from place of residence.
- Subsistence expenses (including lodging and meals) for overnight stay (if required due to distance) are allowed but may not exceed maximum per diem allowance for federal government employees. [View gsa.gov lodging per diem rates](https://www.gsa.gov). [View gsa.gov meals and incidental expenses per diem rates](https://www.gsa.gov).

| WITNESS FEES (computation, see <u>28 U.S.C. § 1821</u> for statutory fees) | | | | | | | |
|--|------------|------------|-------------|------------|---------|------------|-------------------------|
| NAME, CITY AND STATE | ATTENDANCE | | SUBSISTENCE | | MILEAGE | | Total Cost Each Witness |
| | Days | Total Cost | Days | Total Cost | Miles | Total Cost | |
| | | | | | | | \$0.00 |
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| | | | | | | | \$0.00 |
| TOTAL | | | | | | | \$0.00 |